

# EXHIBIT 1

**DECLARATION OF H. DEAN STEWARD**

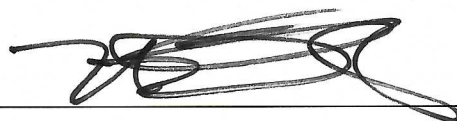
I, H. Dean Steward, declare:

1. I am a practicing attorney licensed in the State of California. I have served as counsel to Mr. Michael Avenatti in connection with multiple matters, including *United States v. Michael John Avenatti* (CDCA Case No. SA CR No. 19-061-JVS) and *United States v. Michael John Avenatti* (SDNY Case No. 19-cr-373-JMF). If called to testify, I would competently provide testimony consistent with this declaration.

2. During various points of time from 2019 to the present, Mr. Avenatti has sought my advice regarding whether he should file personal and business-related state and federal tax returns for the years 2018-2020. In light of Mr. Avenatti's Fifth Amendment rights, the pending financial related charges against Mr. Avenatti, and the potential for additional charges, I have advised Mr. Avenatti during multiple discussions beginning in early 2019 and continuing thereafter not to file any personal or business-related state or federal tax returns for the years 2018-2020. I did so based on my reading of the criminal charges disclosed in the various criminal complaints/indictments issued against Mr. Avenatti in the Southern District of New York and the Central District of California, which related to alleged financial improprieties, including during calendar year 2018; my decades of experience as a criminal defense attorney; my understanding of the Fifth Amendment; my belief that the government was aggressively continuing to pursue additional financial related charges on two coasts; and the fact that one of Mr. Avenatti's law firms, Eagan Avenatti, LLP, had a receiver appointed in February 2019, which I understood prevented Mr. Avenatti from filing any tax returns for that entity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 13, 2022

  
H. DEAN STEWARD